



U.S. Department of Justice

*United States Attorney
Southern District of New York*

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April 10, 2018

BY ECF

Honorable Jesse M. Furman
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *State of New York, et al. v. U.S. Department of Commerce, et al.*, 18-cv-2921 (JMF)

Dear Judge Furman:

This Office and the Department of Justice, Federal Programs Branch, represent Defendants the United States Department of Commerce, Secretary Wilbur L. Ross, Jr., the Bureau of the Census, and Ron S. Jarmin, performing the non-exclusive functions and duties of the Director of the U.S. Census Bureau, (the "Government") in the above-referenced matter filed by the State of New York, sixteen other states, the District of Columbia, a number of cities and counties, and the United States Conference of Mayors (the "Plaintiffs"). We write to respectfully request that the Court adjourn the initial conference that is scheduled for April 20, 2018, at 2:30 p.m. and extend the time for the parties to file a joint letter in advance of the conference, which is currently due on Thursday, April 12, 2018. *See* ECF No. 18. Specifically, we respectfully request that the conference be adjourned until 30 days after service of the complaint—*i.e.*, on or after May 9, 2018—and that the joint letter be due the Thursday the week before the conference as per the Court's prior order.

This Office first received the complaint by electronic mail at the end of the day on Thursday, April 5, 2018, and was only formally served with the complaint yesterday. We need additional time to review Plaintiffs' lengthy complaint, analyze Plaintiffs' allegations and discuss internally in order to meaningfully confer with the Plaintiffs as required by the Court's order and provide the information that the Court has requested be included in the joint letter. *See* ECF No. 18. Due to the important issues raised by Plaintiffs' complaint, this case requires coordination at high levels within the Department of Justice and the Department of Commerce.

This is the first request for an extension in this matter and the requested extension will not impact any other deadlines because the requested adjournment will still result in the conference being held well in advance of the Government's deadline to file a responsive pleading on June 8, 2018. Counsel for the Government conferred with Plaintiffs on April 9 and 10, 2018, and Plaintiffs consented to this request.

We thank the Court for its consideration of this matter.

Respectfully submitted,

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